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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

**In re:**

**PURDUE PHARMA L.P., et al.,**

**Debtors.<sup>1</sup>**

**Chapter 11**

**Case No. 19-23649 (RDD)**

**(Jointly Administered)**

**DEBTORS' MOTION FOR LEAVE TO EXCEED THE PAGE  
LIMIT IN FILING MEMORANDUM OF LAW IN SUPPORT OF  
CONFIRMATION OF DEBTORS' SIXTH AMENDED JOINT CHAPTER 11  
PLAN OF REORGANIZATION OF PURDUE PHARMA L.P. AND ITS  
DEBTOR AFFILIATES AND OMNIBUS REPLY TO OBJECTIONS THERETO**

Purdue Pharma L.P. (“**PPLP**”) and its affiliated debtors in the above-captioned chapter 11 cases, as debtors and debtors in possession (collectively, the “**Debtors**”), respectfully

<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

represent as follows in support of this motion (“**Motion**”):

1. The *Second Amended Order Establishing Certain Notice, Case Management, and Administrative Procedures*, entered on November 18, 2019 [Dkt. No. 498] (“**Case Management Order**” or “**CMO**”), provides that “[u]nless granted prior permission, motions, applications and objections are limited to 40 pages and replies and statements are limited to 20 pages.” (CMO Ex. 1, ¶ 15.)

2. In response to the Debtors’ *Sixth Amended Joint Chapter 11 Plan of Reorganization of Purdue Pharma L.P. and its Affiliated Debtors* [Dkt. No. 3185] (the “**Plan**”), more than 40 objections and supplemental objections, joinders, statements, and letters, including a number of *pro se* letter objections (collectively, “**Objections**”) were filed, excluding those Objections which have subsequently been withdrawn. The Objections consist of approximately 450 pages of briefing and in excess of 200 pages of exhibits.

3. For the convenience of the Court and the objecting parties, the Debtors are filing simultaneously herewith a memorandum of law in support of confirmation of the Plan and omnibus reply to objections thereto (“**Confirmation Brief**”) that responds to 38<sup>2</sup> of the Objections instead of filing as many as 38 separate reply briefs.

4. To effectively respond to the Objections in a single memorandum and facilitate the orderly presentation of issues to the Court, the Debtors require more than the 40 pages permitted for motions or the 20 pages permitted for reply briefs by the Case Management Order. The length of the Debtors’ Confirmation Brief is 190 pages, exclusive of the table of contents and table of authorities. For the convenience of the Court and the parties, the Debtors also have

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<sup>2</sup> The Debtors’ Confirmation Brief does not include responses to the Distributors, Manufacturers, and Pharmacies’ objections to confirmation of the Plan [Dkt. No. 3306] and related objections and joinders. The objections of Distributors, Manufacturers, and Pharmacies will be addressed in a separate pleading to be filed on August 9, 2021.

prepared a summary of the Objections and the Debtors' responses thereto, which is 19 pages and attached to the Confirmation Brief as Appendix A ("Omnibus Objections Response Chart").

5. For the above reasons, the Debtors respectfully request that this Court grant the Debtors leave to file a Confirmation Brief of 209 pages (including the Omnibus Objections Response Chart), exclusive of the table of contents and table of authorities filed simultaneously herewith.

Dated: August 5, 2021  
New York, New York

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**Exhibit A**

**Proposed Order**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

**In re:**

**PURDUE PHARMA L.P., et al.,**

**Debtors.<sup>1</sup>**

**Chapter 11**

**Case No. 19-23649 (RDD)**

**(Jointly Administered)**

**[PROPOSED] ORDER GRANTING LEAVE TO EXCEED PAGE  
LIMIT IN MEMORANDUM OF LAW IN SUPPORT OF CONFIRMATION  
OF DEBTORS' SIXTH AMENDED JOINT CHAPTER 11 PLAN OF  
REORGANIZATION OF PURDUE PHARMA L.P. AND ITS DEBTOR  
AFFILIATES AND OMNIBUS REPLY TO OBJECTIONS THERETO**

Upon the motion, dated August 5, 2021 ("Motion"), of Purdue Pharma L.P. ("PPLP") and certain affiliated debtors, as debtors and debtors in possession (collectively, the "Debtors"), for an order granting leave to exceed the page limit in filing the Debtors' Memorandum of Law (including the omnibus objections response chart attached thereto) in support of confirmation of the Debtors' *Sixth Amended Joint Chapter 11 Plan of Reorganization of Purdue Pharma L.P. and its Debtor Affiliates* [Dkt. No. 3185], the Court finds that the Debtors have shown good cause to exceed the page limit set out by the *Second Amended Order Establishing Certain Notice, Case Management, and Administrative Procedures*, entered on November 18, 2019 [Dkt. No. 498]. Based on this finding, it is hereby:

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ORDERED, that the Debtors may exceed this Court's page limits for motions, applications, objections, replies, and statements and file a Confirmation Brief that is 209 pages in length (including the omnibus objections response chart), exclusive of the table of contents and table of authorities.

Dated: White Plains, New York

August \_\_, 2021

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THE HONORABLE ROBERT D. DRAIN  
UNITED STATES BANKRUPTCY JUDGE